IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
(EASTERN DIVISION)

JO ANN MOORE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 17-CV__________
	)	
DR. SANJAY T. BHAT, M.D.,	)	
	)	
Defendant.	)	

COMPLAINT

MEDICAL MALPRACTICE/NEGLIGENCE

Now comes the Plaintiff, JO ANN MOORE, by her attorneys, STRELLIS & FIELD, CHARTERED, and for her cause of action against the Defendant, SANJAY T. BHAT, M.D., states as follows:

1. The plaintiff is a citizen and resident of Monroe County, Illinois in the Southern District of Illinois.

2. Jurisdiction of this Court is invoked pursuant to Title 28 United States Code, Section 1332(a). The matter in controversy exceeds Seventy-Five Thousand Dollars ($75,000.00).

3. At times pertinent hereto, the defendant, SANJAY T. BHAT, M.D., was a licensed physician engaged in the practice of his profession in the County of St. Louis, in the Eastern District of Missouri.

4. That on or about September 28, 2016, plaintiff had been under the care and supervision of defendant, SANJAY T. BHAT, M.D., to perform a colonoscopy for the screening for colorectal malignant neoplasm.

5. That on September 28, 2016, while the plaintiff was under the care of the defendant, Sanjay T. Bhat, M.D., Defendant performed a colonoscopy upon plaintiff.

6. At times pertinent hereto, the defendant, Sanjay T. Bhat, M.D., had a duty to provide the plaintiff, Jo Ann Moore, with proper and adequate care within the standard of care generally accepted in the field of medicine.

7. While in the care as stated above, the defendant, Sanjay T. Bhat, M.D., was in violation of his duty to the plaintiff and negligently performed one or more of the following acts:

a. Negligently and carelessly failed to properly treat the laceration and/or rupture of Plaintiff's spleen following the colonoscopy procedure after it was determined that there were certain related physiological conditions that arose and persisted following the subject colonoscopy;

b. Negligently and carelessly failed to monitor the plaintiff following the colonoscopy procedure;

c. Negligently and carelessly lacerated and/or ruptured the spleen of the plaintiff, Jo Ann Moore; and,

d. Negligently and carelessly failed to perform further treatment and diagnostic studies after the defendant had determined that there were certain related physiological conditions that arose and persisted following the subject colonoscopy.

8. As a proximate result of one or more of the aforesaid stated negligent act(s) or omission(s) of the Defendant, SANJAY T. BHAT, M.D., Plaintiff, JO ANN MOORE, has suffered, is suffering, and will suffer severe and permanent disability, injuries, and medical expenses.

WHEREFORE, plaintiff, JO ANN MOORE, demands judgment against the defendant, SANJAY T. BHAT, M.D., in the amount of One Million Dollars ($1,000,000.00), plus costs of suit.

STRELLIS & FIELD, CHARTERED,

BY **s/Jack A. Strellis**

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ATTORNEYS FOR PLAINTIFF

**PLAINTIFF DEMANDS
TRIAL BY JURY**